

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS**

MARSHALL SMITH, BRANDON
HERMAN, CHAD PATTERSON, JEFFERY
ROBERTS, MICHAEL WILL, SUSAN
WINSTEAD, ROBERT BOHANNON,
HOLLY BUCKINGHAM, RICHARD
MORELLO, JR., ROBERT HARRIS,
AMANDA LARISCY, CHARLES
NEWMAN, and PAUL CHRISTIANSEN
individually and on behalf of all similarly
situated persons,

Plaintiffs,

v.

COMPLYRIGHT, INC., a Minnesota
corporation,

Defendant.

Civil Action No. 1:18-cv-4990

Hon. Edmond E. Chang

CLASS ACTION

Jury Trial Demanded

**REPRESENTATIVE PLAINTIFFS' UNOPPOSED
MOTION FOR LEAVE TO FILE A BRIEF IN EXCESS OF THE PAGE LIMIT**

Representative Plaintiffs Marshall Smith, Brandon Herman, Chad Patterson, Jeffery Roberts, Michael Will, Susan Winstead, Robert Bohannon, Holly Buckingham, Richard Morello, Jr., Robert Harris, Amanda Lariscy, Charles Newman, and Paul Christiansen (“Representative Plaintiffs”), individually and on behalf of the Settlement Class, by and through Co-Lead Settlement Class Counsel, request leave to file a brief in excess of the 15-page limit, but not to exceed 26 pages.

1. On May 20, 2019, Representative Plaintiffs and defendant ComplyRight, Inc. (“ComplyRight”) entered into a class action settlement agreement (the “Settlement”). After

briefing, a hearing, and due consideration, the Court entered an order granting preliminary approval of the Settlement on May 24, 2019.

2. Representative Plaintiffs' Motion for Final Approval of Class Action Settlement Agreement and Incorporated Memorandum of Law provides background information on the nature of the litigation, describes the benefits of the settlement, details the success of the notice program and Settlement Class members' overwhelmingly positive reaction to the Settlement, and includes legal and factual analysis demonstrating that the Settlement satisfies the requisite standard of fair, reasonable, and adequate, and that the Settlement Class should be certified for settlement purposes only. To provide appropriate discussion and analysis of the issues covered in the filing, Representative Plaintiffs request leave to file a brief in excess of the 15-page-limit, but not to exceed 26 pages. A copy of Representative Plaintiffs' Motion for Final Approval of Class Action Settlement Agreement and Incorporated Memorandum of Law is attached hereto as Exhibit 1.

3. On September 30, 2019, one of Co-Lead Settlement Class Counsel contacted one of ComplyRight's counsel regarding the relief requested herein and was advised that ComplyRight does not oppose Representative Plaintiffs' request for an extension of the page limit.

WHEREFORE, Representative Plaintiffs respectfully request leave to file their Motion for Final Approval of Class Action Settlement Agreement and Incorporated Memorandum of Law, which exceeds fifteen pages.

Dated: September 30, 2019

Respectfully submitted,

/s/ Erich P. Schork

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Co-Lead Settlement Class Counsel

CERTIFICATE OF SERVICE

I hereby certify that on September 30, 2019, the foregoing document was filed with the Court's CM/ECF system, which will provide notice of electronic filing to all counsel of record.

/s/ Erich P. Schork